

## REMARKS/ARGUMENTS

### No New Matter

Currently amended claims 1, 5, 6, 8 and 11 clarify that each storage area is **a peer-addressable** storage area that are individually accessible **as peers** by clients of the storage array. Support for peer-addressable elements can be found in the parent application having serial number 10/473713 on page 2, line5; page 4, line 10; and the abstract. The parent application specifically contemplates having disaggregated elements (e.g., network addressable storage elements) that function as peers to each other and to external devices.

No new matter has been added.

### 35 USC 103

The Office rejected claims 1, 3-8, 10 and 11 under 35 USC 103 as being obvious over Wang et al. (US Patent 6,834,326) in view of Anderson et al. (“Serverless Network File Systems”). The applicants respectfully disagree, especially in view of the amendments entered herein.

Currently amended claims 1, 5, 6, 8 and 11 clarify that each storage area is a peer-addressable storage area that are individually addressable as peers by clients of the storage array where each client has an independent RAID controller. Both Wang and Anderson, alone or combine, fail teach, suggest, or motivate that storage areas can be peer addressable. Anderson describes “a serverless system [that] utilizes workstations cooperating as peers to provide all file system services” (see Abstract) that employs RAID. However, one should not confuse workstations operating as peers with individual storage arrears operating as peers. In the applicant’s approach each storage area can be network addressable directly as a peer by other storage areas and by clients. In fact, a single hard disk can support multiple peer-addressable logical partitions. Rather, Anderson simply contemplates addressing a client workstation as a workstation that has accessible storage (see Figure 2 and corresponding text) using known prior art techniques including RPC over TCP/IP (see Section 7.2, top of page 25).

The applicants respectfully submit the rejections of claims 1, 5, 6, 8 and 11 are overcome. Claims 3, 4, 7 and 10 are allowable by virtue of their dependency on their respective parent claims.

The Office rejected claim 2 under 35 USC 103 as being obvious over Wang et al. (US Patent 6,834,326) in view of Anderson et al. (“Serverless Network File Systems”) in further view of Kim et al. (“Internet Multicast Provisioning Issues for Hierarchical Architecture”). Again, the applicants respectfully disagree, especially in view of the amendments entered herein. Kim also lacks any teaching, suggestion, or motivation regarding clients having independent RAID controllers to access peer-addressable, multicast storage areas to bring Wang and/or Anderson in alignment with the features recited in claim 1. Therefore, claim 2 is allowable by virtue of its dependency on claim 1.


The Office rejected claims 12-16 under 35 USC 103 as being obvious over Wang et al. (US Patent 6,834,326) in view of Anderson et al. (“Serverless Network File Systems”) in further view of Lin et al. (“RMPT: A Reliable Multicast Transport Protocol”). Again, the applicants respectfully disagree, especially in view of the amendments entered herein. Parent claim 11 recites that a dynamic mirror comprises peer-addressable storage areas. As discussed above, Wang and/or Anderson fail to teach, suggest, or motivate having peer-addressable storage areas that are accessible as peers by clients supporting independent RAID controllers. Although Lin discusses multicast systems, Lin fails to add anything to Wang and/or Anderson to arrive at peer addressable storage areas as recited in claim 11. Therefore, claims 12 through 16 are allowable by virtue of their dependency on claim 11.

### **Request For Allowance**

Claims 1-8 and 10-16 are pending in this application. The applicants request allowance of all pending claims.

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